

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

JAMES P. VANDER SALM and)
JESSICA T. VANDER SALM, as Trustees)
of the Judith P. Vander Salm Irrevocable Trust,)
and JUDITH P. VANDER SALM,)

Plaintiffs,)

v.)

BAILIN & ASSOCIATES, INC.,)
the SALISBURY HILL CONDOMINIUM TRUST,)
PETER T. KARASSIK, individually,)
JOHN L. MACKOUL, individually,)
THOMPSON-LISTON ASSOCIATES, INC.,)
PATRICK J. HEALY, individually,)
ROTTI CONSTRUCTION COMPANY, INC.,)
WALTER R. ROTTI, individually,)
ECOTEC, INC.,)
and PAUL J. MCMANUS, individually,)

Defendants.)

CIVIL ACTION NO.
4:11-cv-40180-TSH

DEFENDANTS' SUPPLEMENTAL EXPERT DISCLOSURE

Pursuant to Fed. R. Civ. P. 26(a)(2), defendants Bailin & Associates, Inc., Peter T. Karassik, John L. MacKoul, Thompson-Liston Associates, Inc., Patrick J. Healy, Rotti Construction Company, Inc., and Walter R. Rotti (collectively "Defendants") hereby supplement the expert report of Scott W. Horsley, disclosed on January 1, 2013 pursuant to Fed. R. Civ. P. 26(a)(2)(B).

Attached hereto is a supplemental figure prepared by Mr. Horsley plotting actual and hypothetical locations of the soil borings performed by Soil Exploration Corporation in 1986, in further support of the opinions expressed in Mr. Horsley's report disclosed on January 1, 2013.

Respectfully submitted,
BAILIN & ASSOCIATES, INC., PETER T. KARASSIK,
JOHN L. MACKOUL, THOMPSON-LISTON ASSOCIATES, INC.,
PATRICK J. HEALY, WALTER R. ROTTI
and ROTTI CONSTRUCTION COMPANY, INC.,

by their attorneys,
/s/ Catherine A. Bednar
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CERTIFICATE OF SERVICE

I hereby certify that this document and accompanying attachments were served on all counsel of record via e-mail on March 21, 2013.

/s/ Catherine A. Bednar
Catherine A. Bednar

